Bavagnoli & Bavagnoli, LLC

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Tel (973)785-9522
Fax (973)785-9229
E-Mail: RJBavagnoli@aol.com
rcbesq@bavlaw.com

March 9, 2017

Robert J. Bavagnoli+*
Ronald C. Bavagnoli #*

Also Member of NY Bar # Also Member of PA Bar+ Also Member of DC Bar*

Reply to: Totowa Office

Essex County Office: Newark Gateway Center One Gateway Center, Suite 2600 Newark, NJ 07102

New York Office: 232 Madison Avenue, Suite 1200 New York, NY 10016

VIA FACSIMILE (732) 902-5398

Francesca A. Arcure, Esq. Buckley Madole, PC-99 Wood Avenue South, Suite 803 Iselin, NJ 08830

> RE: Craig DeFazio and Cynthia DeFazio, Debtors Chapter 13 Bankruptcy – Case No.: 14-29154

Dear Ms. Arcure:

As you know, our office represents Debtors, Craig DeFazio and Cynthia DeFazio, with respect to the above-captioned matter.

Pursuant to your telephone conversation with my paralegal Joanne last week, with respect to your pending motion currently returnable on March 15, 2017, wherein, Joanne had advised you that our clients would be able to cure their post-petition mortgage payments due, outside the plan.

You had advised her to contact you on Thursday, March 9, 2017, to obtain the amount needed to bring my clients current with the mortgage payments outside the plan.

Our office had left 2 messages today, which we have not heard from you.

Upon receipt of this correspondence, kindly contact our office and advise as to the amount needed to bring my clients current with the mortgage payments outside the plan.

I look forward to hearing from you shortly.

Very truly yours,

Ronald C. Bavagnoli

cc: Craig & Cynthia DeFazio

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Document Page 2 of 5

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Case 14-29154-RG Doc 77 Filed 04/04/17 Entered 04/04/17 11:09:43 Desc Main Document Page 3 of 5

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March 31, 2017

Robert J. Bavagnoli+*. Ronald C. Bavagnoli #*

Also Member of NY Bar # Also Member of PA Bar+ Also Member of DC Bar*

Reply to: Totowa Office

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SECOND REQUEST

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Very truly yours,

Ronald C. Bavagnoli

cc: Craig & Cynthia DeFazio

Essex County Office: Newark Gateway Center One Gateway Center, Suite 2600 Newark, NJ 07102

<u>New York Office</u> 232 Madison Avenue, Suite 1200 New York, NY 10016 บ3/31/2017 11 08 FAX

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March 31, 2017

New York Office: 232 Madison Avenue, Suite 1200 New York NY 10016

Newark, NJ 07102

Reply to: Totowa Office

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Reply to: Totowa Office

March 31, 2017

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